

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA

GURINDER SINGH BAINS, as Personal
Representative of the ESTATE of
JASWINDER SINGH, deceased, HAR-
PREET SINGH and his wife, DILPREET
KAUR, and LAKHWINDER KAUR,

Plaintiffs,

v.

AMERICAN TACTICAL, INC., ANTHONY
DICHARIO, JOSEPH CALABRO,
SCHMEISSER GMBH, and 365 PLUS
D.O.O.

Defendants.

Civil Action No. 2:24-cv-03970-BHH

Jury trial requested

STIPULATION

The plaintiffs, GURINDER SINGH BAINS, as Personal Representative of the ESTATE of JASWINDER SINGH, deceased, HARPREET SINGH and his wife, DILPREET KAUR, and LAKHWINDER KAUR, and defendants, AMERICAN TACTICAL, INC., ANTHONY DICHARIO, and JOSEPH CALABRO, hereby agree and stipulate to the following pre-answer schedule:¹

Plaintiffs intend to file a Second Amended Complaint to address issues related to the transfer of this case to South Carolina on or before August 19, 2024;

In lieu of an Answer, Defendants intend to file a Motion to Dismiss pursuant to Rule 12 by October 7, 2024;

¹ Defendants Schmeisser GMBH and 365 PLUS D.O.O. are foreign entities, have not been served, and have not appeared in this action.

Plaintiffs' deadline to file opposition to Defendants' Motion to Dismiss will be filed by November 12, 2024;

Defendants' deadline to file a reply in support of their Motion to dismiss will be filed by November 26, 2024.

The parties request oral argument on the prospective Motion to Dismiss.

The parties do not waive any claims or defenses by entry of this stipulation including all substantive, jurisdictional, and procedural defenses.

Dated: August 6, 2024

Respectfully submitted,

<p><u>/s/ Poorad Razavi</u></p> <p>Leslie Mitchell Kroeger, Esq. (pro hac vice to be filed) Poorad Razavi, Esq. (pro hac vice to be filed) Rachael Flanagan, Esq. (pro hac vice to be filed) COHEN MILSTEIN SELLERS & TOLL 11780 U.S. Highway One, Suite N500 Palm Beach Gardens, FL 33408 T: (561) 515-1400 lkroeger@cohenmilstein.com prazavi@cohenmilstein.com rflanagan@cohenmilstein.com</p> <p>and</p> <p>Jay Chaudhuri, Esq. (pro hac vice to be filed) COHEN MILSTEIN SELLERS & TOLL 407 North Person Street Raleigh, NC 27601 jchaudhuri@cohenmilstein.com</p> <p>and</p>	<p><u>/s/ J. Michael Montgomery</u></p> <p>J. Michael Montgomery ROBINSON GRAY STEPP & LAFFITTE 2151 Pickens Street Suite 500 PO Box 11449 (29211) Columbia, SC 29201 Direct 803.231.7833 mmontgomery@robinsongray.com</p> <p>and</p> <p>Christopher Renzulli, Esq. (pro hac vice to be filed) Jeffrey Malsch, Esq. (pro hac vice to be filed) Justin Gottuso, Esq. (pro hac vice to be filed) RENUZZI LAW FIRM, LLP One North Broadway, Suite 1005 White Plains, NY 10601 T: (914) 285-0700 crenzulli@renzullilaw.com jmalsch@renzullilaw.com jgottuso@renzullilaw.com</p>
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<p>Douglas N. Letter, Esq. <i>(pro hac vice to be filed)</i> Philip H. Bangle, Esq. <i>(pro hac vice to be filed)</i> BRADY UNITED AGAINST GUN VIOLENCE 840 First Street NE, Ste. 400 Washington, DC 20002 pbangle@bradyunited.org dletter@bradyunited.org</p> <p><i>Counsel for Plaintiffs</i></p>	<p><i>Counsel for Defendants</i> <i>American Tactical, Inc., Anthony DiChario,</i> <i>and Joseph Calabro</i></p>
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CERTIFICATE OF SERVICE

I, J. Michael Montgomery, attorney for the defendants hereby certify that on the 7th day of August, 2024, a true copy of the foregoing was filed through the ECF System and sent electronically to the registered participants as identified on the Notice of Electronic Filing and that paper copies will be served by first-class mail, postage prepaid, upon anyone indicated as a non-registered participant.

/s/ J. Michael Montgomery